

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

UNITED STATES OF AMERICA,
Appellee

24-4293

vs.

WILLIAM FLINN, JR.,
Appellant

MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT'S OPENING BRIEF AND JOINT APPENDIX

Appellant, William Flinn, Jr. (Flinn), through counsel, Diana Lynn Stavroulakis, Esq., moves the Court, pursuant to Rule 26(b) of the Federal Rules of Appellate Procedure, for an enlargement of time within which to file the opening brief and the joint appendix, and submits:

1. The Opening Brief and Appendix are due to be filed on December 20, 2024. Counsel respectfully requests an extension to finish drafting the argument and making necessary corrections, and to finalize both the brief and appendix for filing.
2. Counsel's Father's health rapidly declined within the last two (2) months, prompting that he be hospitalized four (4) times. As her

Father's primary healthcare advocate, counsel participated in countless consultations with specialists, as well as "teams" of specialists while her Father was being treated at Allegheny General Hospital in Pittsburgh, PA. Counsel gave compassionate care to her Father throughout this time. Counsel's Father passed away on November 29, 2024, with his viewing and Greek Orthodox funeral held December 3rd & 4th, 2024. Since that time, counsel has taken appropriate steps regarding her Father's estate, while also attending to day-to-day operations of her private law practice.

3. Counsel files this motion in good faith and not for purposes of delay.

WHEREFORE, counsel respectfully requests an enlargement of time for filing Appellant's Opening Brief and the Joint Appendix to January 24, 2025.

Respectfully submitted,

/s/Diana Lynn Stavroulakis
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Certificate of Service

I hereby certify that the individual listed below is a filing user of the CM/ECF System and will be served electronically by the Notice of Docketing Activity generated upon the electronic filing of this motion.

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Date: December 18, 2024

/s/Diana Lynnn Stavroulakis
Diana Lynn Stavroulakis,
Attorney for Appellant